

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SUPPLEMENTAL DIRECT TESTIMONY OF P.L. (SCOT) FERGUSON
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO 04-00046
5 OCTOBER 29, 2004

6
7
8 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
9 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS

10
11 A. My name is Scot Ferguson. I am employed by BellSouth Telecommunications,
12 Inc. ("BellSouth") as Manager – Network Interconnection Operations. In this
13 position, I handle certain issues related to local interconnection matters, primarily
14 operations support systems ("OSS"). My business address is 675 West Peachtree
15 Street, Atlanta, Georgia 30375.

16
17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE

18
19 A. I graduated from the University of Georgia in 1973, with a Bachelor of
20 Journalism degree. My professional career spans over 30 years with Southern
21 Bell, AT&T, BellSouth Corporation and BellSouth Telecommunications. During
22 that time, I have held positions of increasing responsibility in sales and marketing,
23 customer system design, product management, training, public relations, CLEC
24 support, and my current position in Network Interconnection Operations.

25

1 Q HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?
2

3 A. Yes. I filed Direct Testimony with six (6) exhibits on June 25, 2004
4

5 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT
6 TESTIMONY?
7

8 A On July 15, 2004, the Parties filed a Joint Motion for Abeyance with the
9 Tennessee Regulatory Authority (“Authority” or “TRA”) where the Parties asked
10 for a 90-day abatement of the arbitration proceeding so that they could include
11 and address issues relating to *United States Telecom Association v. FCC*, 359
12 F.3d 554 (D.C. Circuit 2004) (“*USTA II*”) in this proceeding. During the 90-day
13 abatement, the Parties continued to negotiate, and, as a result, several of the issues
14 addressed in my June 25, 2004 Direct Testimony have been resolved.
15

16 My Supplemental Direct Testimony provides BellSouth's position on two (2) of
17 the remaining unresolved arbitration issues related to Attachments 2 and 6 of the
18 Interconnection Agreement. Specifically, I provide testimony on Matrix Item 43
19 (Issue 2-25) – Access to Loop Makeup Information, and I also adopt one issue
20 from direct testimony previously filed on June 25, 2004 by BellSouth witness
21 Carlos Morillo, specifically, Matrix Item 86(b) (Issue 6-3(b)) – Disputes Over
22 Alleged Unauthorized Access to CSRs.
23
24
25

1 Q. HOW IS YOUR SUPPLEMENTAL DIRECT TESTIMONY ORGANIZED?

2

3 A. My Supplemental Direct Testimony includes my original Direct Testimony
4 verbatim for unresolved Matrix Item 43 (Issue 2-25), as well as original Direct
5 Testimony verbatim for unresolved Matrix Item 86(b) (Issue 6-3(b)) adopted from
6 BellSouth witness Morillo's Direct Testimony. The Direct Testimony was filed
7 on June 25, 2004. I have removed the discussion and associated exhibits related
8 to those issues addressed in my original Direct Testimony that subsequently have
9 been resolved between the Parties.

10

11 Q. DO YOU HAVE ANY PRELIMINARY COMMENTS REGARDING THE
12 UNRESOLVED ISSUES IN THIS PROCEEDING?

13

14 A. Yes. The issues for which I provide testimony may or may not have underlying
15 legal arguments. Because I am not an attorney, I offer no legal opinions on the
16 issues. I offer testimony purely from an operations and policy perspective. If
17 these issues require any legal arguments, BellSouth's attorneys will provide them
18 in the appropriate briefs in this proceeding.

19

20 *Item 43 (Issue 2-25): Under what circumstances should BellSouth be required to*
21 *provide a CLEC with Loop Makeup information on a facility used or controlled by*
22 *another CLEC? (Attachment 2, Section 2.18.1.4)*

23

24 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

25

1 A. Very simply, BellSouth should not be required to provide a CLEC's loop
2 information to a competing CLEC without the inquiring CLEC obtaining a Letter
3 of Authorization ("LOA") from the CLEC that currently is using the loop. The
4 CLECs established this regional policy in the Shared Loop Collaborative, which
5 works in conjunction with CCP, to protect CLEC information. As a result of this
6 policy mandated by the CLECs, BellSouth views a request by a CLEC for loop
7 makeup ("LMU") information on another CLEC's existing loop the same as it
8 views a CLEC's request for customer service record ("CSR") information on
9 another CLEC's end user – an LOA is required. BellSouth's proposed
10 interconnection agreement language properly defines the need for an LOA as a
11 means to protect CLEC information

12
13 Interestingly, the Joint Petitioners do not propose *any* interconnection agreement
14 language regarding protection of LMU information.

15
16 As the state regulatory bodies and the FCC all have previously ruled,¹ BellSouth
17 complies with the nondiscriminatory access requirements to provide LMU
18 information for loops owned by BellSouth, and used either for BellSouth's own
19 customers or provided to the requesting CLEC. The LOA requirement was in
20 place when BellSouth's LMU process was reviewed and ruled compliant by this
21 Authority. To protect *all* CLECs, BellSouth does not provide so-called "third-
22 party" loop information without an LOA, nor should it. The first time BellSouth

¹ In its BellSouth 271 *Advisory Opinion to the Federal Communications Commission* (Docket No. 97-00309), at page 27, the Tennessee Regulatory Authority "unanimously voted that BellSouth is providing or generally offering nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1) and, therefore, is in compliance with Checklist Item 2." Checklist Item 2 includes access to loop makeup information.

1 did so, any CLEC – including the Joint Petitioners – likely would be standing on
2 this Authority’s doorstep to complain about BellSouth’s actions.

3
4 Q. ON WHAT BASIS DOES BELL SOUTH TAKE ITS POSITION?

5
6 A. As previously stated, BellSouth’s position is based on a decision made by the
7 CLECs in the Shared Loop Collaborative, which works in conjunction with CCP,
8 to protect CLEC loop information. As such, BellSouth considers its ‘customer’ to
9 be the CLEC for which the loop is provided, and not the end user for whom the
10 CLEC in turn is providing the service BellSouth has a responsibility – a
11 responsibility established by the CLECs – to protect information regarding its
12 customers’ (in this case, the CLECs’) service records. The LOA, in general, is a
13 mechanism to ensure BellSouth that one CLEC really does want to allow another
14 CLEC to obtain information about its facilities or customers LOAs have been
15 used successfully for years to protect sensitive information while still allowing
16 appropriate access to that information. In addition, this LOA requirement has
17 been in effect for some time, and, to the best of my knowledge, this is the first
18 time that it has been an arbitration issue.

19
20 In regard to loop makeup information, the FCC’s 1999 *UNE Remand Order* is
21 very specific about what an incumbent Local Exchange Carrier’s (“LEC’s)
22 obligation includes,² and providing third-party loop information is not one of
23 those obligations. BellSouth is compliant with the requirements of both the *UNE*
24 *Remand Order* and the nondiscriminatory access requirements of Section 271 as

² See *FCC 99-238* at ¶¶ 426-427

1 ruled by the states and the FCC, and, further, as I explain in more detail below,
2 BellSouth is complying with the consensus of the CLECs in its region.

3

4 Q. WHAT HAS BEEN THE EVOLUTION OF THE REQUIREMENT FOR LOAS
5 RELATED TO LMU INFORMATION?

6

7 A. BellSouth first developed the LMU process in response to the *UNE Remand*
8 *Order* and in response to a CLEC-initiated change request (CR0361) submitted
9 through BellSouth's Change Control Process ("CCP"). As part of that initial
10 development, BellSouth simply adapted the same rules to loop makeup that
11 applied to CLECs viewing CSR information; i.e., CLECs could only view LMU
12 information for BellSouth's customers' loops, or for that requesting CLEC's own
13 customers' loops. In 2001, the CLECs *themselves*, through the Shared Loop
14 Collaborative,³ developed and approved the process as it exists today, including
15 the provision whereby a CLEC can view another CLEC's LMU information *only*
16 *if there is an LOA*. Attached, as Exhibit SF-1, is a copy of the Letter Of
17 Authorization (LOA) for Line Splitting CLEC Information Package. It may also
18 be found at BellSouth's interconnection website.

19 <http://interconnection.bellsouth.com/guides/unedocs/loa.pdf>

20

³ On January 26, 2000, a Line Sharing Collaborative was established to develop, with the mutual agreement of the so-called Data Local Exchange Carriers ("DLECs") and BellSouth, the processes and procedures required to implement Line Sharing to meet the requirements of the FCC 3rd Report and Order in CC Docket No. 98-147, and 4th Report and Order in CC Docket No. 96-98 released December 9, 1999 (Line Sharing Order). In response to CC Docket 98-147, the "Line Share Reconsideration Order," also known as the Line Splitting Order, the Line Splitting Collaborative was established on April 19, 2001. Due to similarities in issues between Line Sharing and Line Splitting, it was agreed mutually in May 2001 to combine what was then seven outstanding central office-based/Remote Terminal based Line Sharing/Line Splitting collaboratives into a single "Shared Loop Collaborative."

1 It is my understanding that none of the Joint Petitioners is an active member of
2 the Shared Loop Collaborative, and that is understandable if none of the Joint
3 Petitioners has a market in shared loop products. It is also my understanding that
4 the Joint Petitioners *are* CCP members, and all CCP-member CLECs were
5 provided user requirements when the LMU process was originally developed
6 (CR0361, implemented in Release 7.0 on July 29, 2000) and when the LOA
7 requirements were added (CR0409, implemented in Release 10.3 on January 5,
8 2002). I have attached a copy of those original LMU requirements as Exhibit SF-
9 2 and the LOA requirements as Exhibit SF-3.

10

11 Q. IS IT CLEAR TO BELL SOUTH WHY THE JOINT PETITIONERS BELIEVE
12 BELL SOUTH IS OBLIGATED TO PROVIDE A CLEC'S LMU
13 INFORMATION TO ANOTHER CLEC WITHOUT A LETTER OF
14 AUTHORIZATION?

15

16 A. No. What *is* clear, however, is that Joint Petitioners want certain information they
17 feel they cannot get apparently because other CLECs might refuse to give
18 permission via an LOA. If that were to be proven true, that lack of cooperation or
19 agreement among CLECs does not – and should not – involve BellSouth.

20

21 Any disagreement among the CLECs with respect to the viewing of LMU
22 information should be worked out among the CLECs, or brought before this
23 Authority independent of this Section 252 arbitration proceeding. If there is, in
24 fact, a problem between CLECs that inhibits the attainment of an LOA, it is *not*
25 the result of any action by BellSouth. If the Joint Petitioners believe that their

1 inability to access the information of other CLECs has some anticompetitive
2 effect, then the Joint Petitioners' quarrel is with those other CLECs – not with
3 BellSouth.

4
5 Although BellSouth has been placed in a curious 'gatekeeper' position by the
6 rules of the Telecommunications Act, BellSouth should not be required to provide
7 information without an LOA simply because the Joint Petitioners now disagree
8 with the policy established by the CLECs because they have concerns about
9 asking another CLEC for permission to view such information.

10
11 Q. HAS THERE BEEN A SIMILAR SITUATION REGARDING CLEC-TO-CLEC
12 TRANSACTIONS, AND, IF SO, HOW WAS IT HANDLED?

13
14 A. Yes. As I referenced in a previous answer, BellSouth requires LOAs when one
15 CLEC requests from BellSouth CSR information about another CLEC's end user
16 in an attempt to win that end user. A number of CLECs raised this CSR issue to
17 BellSouth as a concern – through the CCP.

18
19 BellSouth continued to maintain its compliance with Customer Proprietary
20 Network Information ("CPNI") requirements with respect to CSRs, but, at
21 BellSouth's suggestion, and by working through the CCP, the CLECs themselves
22 developed and approved a process to allow the reciprocal viewing of CSRs,
23 relieving BellSouth of the responsibility as watchdog over the process. Change
24 Request CR1633 (attached as Exhibit SF-4) is currently progressing through the
25 CCP, and BellSouth is awaiting a final response from the CLECs. If CR1633 is

1 prioritized by CCP ballot, it will be scheduled for implementation in a future
2 release.⁴ I would like to point out that one of the provisions of CR1633 – as
3 determined by the CLECs – is the requirement of “proper authorization defined as
4 end user authorization that complies with applicable state and federal law ”
5
6 BellSouth suggests that the CLECs (including the Joint Petitioners) use the same
7 process within the CCP for working out the details of the third-party LMU issue.⁵
8 If the consensus of the CCP determines that the CLECs are agreeable to let each
9 other view LMU information on an unfettered-access basis and absolve BellSouth
10 of any liability, the CLECs should then submit a change request to the CCP
11 asking for a system change to allow it. Assuming appropriate prioritization by the
12 CLECs in accordance with CCP guidelines, and assuming no conflict with the
13 earlier decisions by the Shared Loop Collaborative, BellSouth will support the
14 change and will be relieved of its watchdog responsibilities in the LMU arena as
15 in the CSR arena.
16
17 Q. HOW DOES BELL SOUTH WANT THIS AUTHORITY TO RESOLVE THIS
18 ISSUE?
19
20 A. BellSouth requests that the Authority order that BellSouth's proposed language on
21 this issue be adopted as the appropriate language for this interconnection

⁴ The prior implementation of CR0184 and CR0246 gave CLECs the ability to view each other's CSRs for Resale and UNE-P end users, when the current CLEC grants that authorization. CR1633 expands the types of accounts for which CLECs can view CSRs.

⁵ Although an appropriate suggestion conceptually, the Joint Petitioners – and this Authority – should not lose sight of the fact that a group of CLECs – through the Shared Loop Collaborative – has already determined that LOAs for LMU is an appropriate mechanism to protect the CLECs. It is likely that the participants in the Shared Loop Collaborative (who are also CCP members) would play a large part in determining any changes to the current requirements for LOAs.

1 agreement. There is nothing to support the Joint Petitioners' position statement
2 that BellSouth should be required to provide this information in the absence of
3 authorization from the CLEC for which BellSouth is currently providing the loop,
4 and this Authority certainly should not order BellSouth to implement a change in
5 an existing process (to satisfy only the Joint Petitioners) that countermands the
6 current regional process that was developed by the CLECs.

7
8 Further, this Authority should support BellSouth's suggestion that if the Joint
9 Petitioners wish to pursue this issue, they should do so under the auspices and
10 guidelines of the CCP and/or Shared Loop Collaborative, thereby allowing
11 BellSouth to continue to abide by the current Shared Loop Collaborative-
12 approved rules regarding LMU information until such time as BellSouth is
13 properly relieved of that responsibility by consensus of the CCP and/or the Shared
14 Loop Collaborative

15
16 ***Item 86 (Issue 6-3) (B) How should disputes over alleged unauthorized access to CSR***
17 ***information be handled under the agreement? (Attachment 6, Sections 2.5.6.2 and***
18 ***2.5.6.3)***

19
20 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

21
22 A The Party providing notice of the alleged impropriety should notify the offending
23 Party that additional applications of service may be refused, that any pending
24 orders for service may not be completed, and/or that access to ordering systems
25 may be suspended if such use is not corrected or ceased by the fifth (5th) calendar

1 day following the date of the notice. In addition, the alleging Party may, at the
2 same time, provide written notice to the person(s) designated by the other Party to
3 receive notices of noncompliance that the alleging Party may terminate the
4 provision of access to ordering systems to the other Party and may discontinue the
5 provisioning of existing services if such use is not corrected or ceased by the tenth
6 (10th) calendar day following the date of the initial notice. If the other Party
7 disagrees with the alleging Party's charges of unauthorized use, the other Party
8 should proceed pursuant to the dispute resolution provisions set forth in the
9 General Terms and Conditions of the Agreement.

10

11 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

12

13 A Yes.



Letter of Authorization (LOA) For Line Splitting

***Letter of Authorization (LOA) For
Line Splitting***

CLEC Information Package

(Version 4, October 30, 2003)



Letter of Authorization (LOA) For Line Splitting

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Letter of Authorization (LOA) For Line Splitting

Chapter 1.0: Introduction

1.1 Purpose and Scope

This document provides procedures to be utilized by the D/CLEC (Data/Competitive Local Exchange Carrier) for processing a Letter of Authorization (LOA) as it pertains to Central Office Based Line Splitting Service. The LOA process provides authorization for the DLEC LOA partner to submit a Loop Makeup (LMU) data request, High Frequency Spectrum Central Office (HFS CO) Based Unbundled Loop Modification (ULM) requests, and LSRs (Local Service Requests) associated with Line Splitting Unbundled Network Element Service on behalf of the Voice CLEC LOA Partner.

Please contact your BellSouth CARE Team representative if you have questions about the information contained herein.

1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes through the BellSouth Line Sharing/Splitting Collaborative and through the BellSouth Carrier Notification process.

1.3 Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this CLEC Information Package will be reflected accordingly in this section of the document.

Section	Date/Version	Description
All	01/08/02 – Version 1	Initial Version Release
LOA document added	02/15/2002 – Version 2	Updated Version Release
LOA Web Address Added	02/19/2002 – Version 3	Updated Version Release
All	10/30/2003 – Version 4	Update to the LOA process flow



Letter of Authorization (LOA) For Line Splitting

Chapter 2.0: Overview

The LOA process for Line Splitting was developed by the CLEC Collaborative members in a unified effort to support and authorize BellSouth's role in the release of the Voice CLEC's end user information to their LOA partner (DLEC). This LOA allows the DLEC to view Loop Make Up (LMU) data, order HFS CO Unbundled Loop Modification and order Line Splitting of an end user's loop that belongs to the Voice CLEC for the purpose of provisioning Line Splitting Service.

The executed LOAs will be housed on the Internet for the convenience of all parties involved. The BellSouth Web Master (web master) will create Internet addresses/folders and passwords for each of the CLECs and DLECs participating in LOA partnerships. However, each time that a new Line Splitting partnership is executed, BellSouth must receive an electronically signed LOA from the new Line Splitting Voice CLEC and DLEC partners. The parties agreeing to the LOA must provide electronic signatures on the LOA.

The LOA will be provided via email to the BellSouth CLEC Care Local Support Manager (LSM). The LSM will forward the LOA to the web master via email. The web master will place a copy of the signed LOA document in each party's folder. The folder is password protected. The CLEC for whom the folder has been created will have the password for their respective folder. The only other access to the folder will be a BellSouth Billing Subject Matter Expert.

Changes to folder content may only be processed through the LSM. The CLEC and DLEC will not be permitted to remove documents from the folders. If a newly executed LOA is to be added or if an existing LOA is to be cancelled, the cancellation or new LOA will be provided to the LSM. The same LOA document will be used to notify BST of cancellation. Appropriate fields have been added to make cancellation simple. Appropriate selections with electronic signatures must be made to indicate the cancellation. If a cancellation is received from the CLEC/DLEC a copy of the cancellation will be placed in both parties' respective folders.

Web site for folders

<http://interconnection.bellsouth.com/2partyagree/>



Letter of Authorization (LOA) For Line Splitting

Chapter 3.0: General Guidelines

3.1 Availability

BellSouth offers this service in all nine states within the BellSouth region

CLEC/DLECs must provide LOAs when they are participating in a Line Splitting partnership. The LOA must be on file prior to the DLEC partner issuing requests for LMU, HFS CO ULM, or LSRs associated with Line Splitting Service.

The LMU (manual or electronic) and Line Splitting Local Service Requests will have three fields associated with executed LOAs. The fields must be populated with the Voice CLEC information as follows:

- **LSP AUTH Name** - Name of the person from the Voice CLEC that is providing authorization to the Data LEC
- **LSP AUTH CC** - Company Code of the Voice CLEC
- **LSP AUTH Date** - Date that the Voice CLEC provided authorization to the DLEC

The voice CLEC will provide the DLEC with the Local Service Authorization Code (LSP AUTH) to be used with BellSouth systems and documents when provisioning Line Splitting Service to voice CLEC end users and represents the agreement between the DLEC and CLEC. The LSP AUTH is the voice CLEC Company Code (CC) that appears on the voice CLEC End User Customer Service Record (CSR). The LOA will list all Company Codes for the specified voice CLEC to which the DLEC is authorized.

3.2 Contract Specific Provisions

The LOA is not intended to modify the terms and conditions of the BellSouth Interconnection Agreement. Please refer to the BellSouth Interconnection Agreement for specific language, terms, and conditions applicable for Line Splitting.

D/CLECs must provide LOAs when they are participating in a Line Splitting partnership. The LOA must be on file **prior to** the DLEC partner issuing requests for LMU, HFS CO ULM, or LSRs associated with Line Splitting Service.



Letter of Authorization (LOA) For Line Splitting

Chapter 4.0: Process Guidelines for LOA

4.1 The Letter of Authorization Process

The CLEC will obtain a copy of a LOA from the Collaborative Web Site, shown below and will obtain an electronic signature from both parties. The signed LOA will be provided to the LSM via e-mail. The LSM will provide all documents to the BellSouth web master who will post a copy in each party's folder. The submitting party/parties will receive a confirmation from the LSM that the LOA has been posted and the date of posting.

http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/index.html

4.2 Internet Folder for LOAs

If a folder has not been created for the submitting parties, the LSM will request the web master to create a folder and obtain passwords for the party/parties involved. This will involve a ten (10)-business day turn-around. However, the web master will acknowledge that the document has been received by returning an email of acknowledgement to the LSM. The password will be provided to the new LOA participant/s as soon as the web master has created appropriate folder/s and provided the information back to the LSM. The web master will place a copy of the new LOA in each participating party's folder.



Letter of Authorization (LOA) For Line Splitting

4.3 Electronic Signatures

To Create an Electronic Signature:

To create the electronic signature the computer must be connected to a scanner to complete the following detailed procedure

How to create and insert a scanned picture on to the LOA form.

- First Create a signature legibly on white paper and scan the signature
- Save the scanned image with a .jpg (jpeg) extension by giving it a unique name

To edit the Signature Picture before inserting:

- When the image appears in Microsoft Photo Editor, make any changes you want
- For example you can crop the picture, add special effects to it, and adjust its brightness, contrast and color.
- When finished editing the picture, save changes and then click Exit
Note If Microsoft Photo Editor is not installed, run the Setup program again and install it.
- Now Open the LOA Word document
- Position the insertion point where you want to insert the scanned signature
- On the insert menu you will point to "picture" and then Click "from file" and this will give you the ability to access the picture that you have saved You will double click on the signature picture to insert on to the LOA

4.4 Web Site for LOAs

Users please take caution in selecting your proper folder If you should mistakenly select the wrong folder, you must clear your browser's history file These instructions can be found on the Two Party Agreement web site

<http://interconnection.bellsouth.com/2partyagree/>



Letter of Authorization (LOA) For Line Splitting

Chapter 5.0: Acronyms

CLEC	Competitive Local Exchange Carrier
CO	Central Office
DSL	Digital Subscriber Line
DLEC	Data Local Exchange Carrier
Jpeg	Soft Ware for creating pictures
LMU	Loop Make Up
LOA	Letter of Authorization
LSM	Local Support Manager
LSP AUTH	Local Service Provider Authorization
UNE	Unbundled Network Element



ENCORE USER REQUIREMENTS FOR *MECHANIZATION OF LOOP MAKE-UP FOR CLEC XDSLS*

**ENC7762.DOC
DOCUMENT VERSION 2.0
APRIL 28, 2000**

**Created: 12/06/1999
Revised: 4/28/2000**

PRIVATE/PROPRIETARY: No disclosure outside BellSouth except by written agreement.

FEATURE DESCRIPTION

The mechanized Loop Make-Up Process for CLEC XDSL will provide Loop "Make-Up" detail to the requesting CLEC. The CLEC will use this information to determine if an end user's loop is capable of supporting their implementations of XDSL services.

Relative to CLEC XDSL service, the LM Scope includes the following

- a) Allowing CLECs' to request Loop Makeup detail on existing facilities, (Telephone Number or Circuit ID, - identified), when the facilities are owned by the submitting CLEC or BellSouth
- b) Allowing CLECs to request Loop Makeup detail on new/spare facilities owned by BellSouth
- c) Allowing CLECs to reserve new/spare facilities for a "standard" timeframe
- d) Allowing CLECs to cancel reservations for new / spare facilities within the standard timeframe.
- e) Allowing CLECs to select or input a NC/NCI/SECNCI "codeset reference" that will be used to "fine tune" the facility types returned in the LM. (This "codeset reference" will NOT be used to "qualify (yes/no)" a facility. It will be used only to return a focused, abbreviated list of facilities that are a best match to meet the NC/NCI/SECNCI codes on the request)

The CLEC XDSL pre-order LM transaction will allow the user to input / select

- a) A validated address and Telephone Number, (for requests involving existing facilities).
- b) A validated address and Circuit Identifier, (for requests involving existing facilities).
- c) A validated address only, (for requests involving new / spare facilities)
- d) A NC / NCI / SECNCI codeset OR equivalent that identifies
 - 1) UNE ADSL 2-wire, or
 - 2) UNE HDSL 2 or 4 wire service,
 - 3) UNE UCL-Short (2 or 4 wire)
 - 4) UNE UCL-Long (2 or 4 wire).
- e) Up to ten (10) loops (quantity) for which Loop Make-Up detail is desired. (Applicable to New / Spare facilities only)

The LM process for CLEC XDSL shall respond with detailed information and functionality as specified in the Requirement section of this document.

USER REQUIREMENTS

Requirement #	Description
UR7762.0001	The user shall be able to identify and electronically submit a LM request for CLEC XDSL.
UR7762.0002	The User will receive a positive acknowledgement that the Loop Inquiry and / or reservation request has been completed
UR7762 0003	<p>The user shall receive common English "message detail" responses, as illustrated below</p> <ul style="list-style-type: none"> ▪ Account Information Not Found ▪ Address Not Found ▪ CC Not Valid ▪ CCNA Not Valid ▪ TN / Circuit Format Invalid ▪ TN / Circuit ID not found ▪ Insufficient Information To Process Query ▪ Invalid Input Combination (NC/NCI/SECNCI) ▪ Transaction Successful ▪ Not Authorized to access data (Restricted Service CLEC/ BST does not own / control the account) ▪ System Unavailable ▪ No Mechanized Information Available For This Request ▪ Not authorized to cancel Reservation request. (Not owner (CLEC) of the reservation)
UR7762 0004	<p>The user shall have the ability to perform a preorder transaction to receive Loop Makeup detail for CLEC XDSL UNEs.</p> <p>(The user shall use this detail to evaluate if the loop is capable of supporting their specific XDSL or UCL service implementations)</p>
UR7762.0005	The user shall utilize the Pre-order "address validation" process prior to submitting a request for Loop Qualification / Loop Makeup (LM).
UR7762 0006	<p>The user shall have the data input for Telephone Number and Circuit ID, - FORMAT validated, based upon the following</p> <ul style="list-style-type: none"> ▪ <u>Telephone Number</u> The format is valid if it conforms to rules associated with SOER – S&E, TN format 009. ▪ <u>Circuit ID</u> The format is valid if it conforms to rules associated with SOER – S&E, CLS format 007 or CLT format 007
UR7762 0007	If the user submission for LM involves an invalid Telephone Number, Circuit ID,

Created: 12/06/1999
Revised: 04/28/2000

	and/or Address detail, the user shall receive a message. The message shall identify the invalid element(s) to the user.
UR7762.0008	As a part of the LM process <u>for new/spare facilities</u> , the user shall be able select / input a NC/NCI/SECNCI “codeset <u>reference</u> ” that will be used to “fine tune” the facility types returned in the LM.
UR7762 0009	As a part of the LM interface <u>for new/spare facilities</u> , the user shall be notified that the input / selection of the codeset reference in UR7762 0008 above will be used only to return a focused, abbreviated list of facilities that are a best match to meet the NC/NCI/SECNCI codes on the request. The user shall be further notified that the use of the “codeset reference” should NOT be interpreted as an indication that the returned facilities are suitable or “qualifies” for any specific use.
UR7762 0010	For any given LM query, after initial data is input by the user (to initiate the query process), the user shall not be required to re-key valid data associated with sequential queries in the overall process.
UR7762 0012	In association with a given LM request, the user shall select / input data based upon the following rules: a) A validated address and Telephone Number <u>OR</u> a validated address and Circuit Identifier. (For requests involving existing facilities) b) A validated address only (For requests involving new / spare facilities) c) A NC / NCI / SECNCI codeset <u>OR</u> equivalent that identifies 1) UNE ADSL 2-wire, 2) UNE HDSL 2 wire service 3) UNE HDSL 4 wire service, 4) UNE Copper Loop – Short, 2 wire 5) UNE Copper Loop - Short , 4 wire 6) UNE Copper Loop –Long , 2 wire 7) UNE Copper Loop –Long , 4 wire (For new or existing requests.) d) The number of loops (quantity) for which Loop Make-Up detail is desired (For New / Spare facilities only)
UR7762 0013	The user shall consider their request for LM as valid, when it conforms to one of the following scenarios: A) The request involves existing “ working service” which is owned by the issuing CLEC or BST <u>Or</u> B) The request involves new/ (BST spare) facilities

	<p><u>AND</u></p> <p>C) Involves a single premise address on any given Loop Make-up request.</p>																										
UR7762 0014	If the user request for LM detail is associated with existing working service which is NOT owned by the issuing CLEC or BST, then the user shall receive a message. The message shall indicate that the submitting user is not authorized to receive the requested data for the specified account																										
UR7762 0016	As a part of the LM process <u>for new/spare facilities</u> , the user shall be able to indicate up to ten (10) loops for which Make-up is desired.																										
UR7762.0017	As a part of the LM process <u>for new/spare facilities</u> , the user shall be able to reserve up to ten (10) loops for which Make-up is desired.																										
UR7762 0018	As a part of the LM process <u>for RESERVING new/spare facilities</u> , the user shall be notified that the facilities will be reserved for 4 days (96 hrs)																										
UR7762.0019	Not electronically supported for Phase 1. Restated as assumption. (5 7) to establish intent regarding future release																										
UR7762 0020	Not electronically supported for Phase 1. Restated as assumption. (5.8) to establish intent regarding future release																										
UR7762.0021	<p>The users' response from the CLEC XDSL Loop Make-Up request shall include loop data currently available in the BST LFACs system, - based upon whether an individual loop conforms to service specific conditions listed in UR7762 0065 through UR7762 0070.</p> <p>This returned detail includes the list of items shown below in the LFACS Loop Data section, in addition to any items shown in the OTHER section, which are not implied / referenced by data in the LFACs section</p> <p><u>LFACS LOOP DATA Section</u></p> <table> <tr> <td>LOOP{</td><td>Loop aggregate, 1 per loop</td></tr> <tr> <td>LPSTAT [7]</td><td>Status of assembled facility</td></tr> <tr> <td>RTF [1]</td><td>Receive/Transmit Indicator</td></tr> <tr> <td>SSC [1]</td><td>Single Subscriber Carrier Indicator</td></tr> <tr> <td>FN{</td><td>Segment Aggregate, 1-9 per loop</td></tr> <tr> <td>CA [10]</td><td>Cable identifier</td></tr> <tr> <td>PR [4]</td><td>Pair Identifier</td></tr> <tr> <td>ABP [4]</td><td>Assignable Binding Post</td></tr> <tr> <td>TEA [50]</td><td>Terminal Identifier</td></tr> <tr> <td>TRMED[9]</td><td>Transmission Medium Type</td></tr> <tr> <td>LMU{</td><td>Loop Makeup Aggregate, 1 per segment</td></tr> <tr> <td>LMSTAT [40]</td><td>Loop Makeup Status</td></tr> <tr> <td>LUINT [2]</td><td>Length Unit</td></tr> </table>	LOOP{	Loop aggregate, 1 per loop	LPSTAT [7]	Status of assembled facility	RTF [1]	Receive/Transmit Indicator	SSC [1]	Single Subscriber Carrier Indicator	FN{	Segment Aggregate, 1-9 per loop	CA [10]	Cable identifier	PR [4]	Pair Identifier	ABP [4]	Assignable Binding Post	TEA [50]	Terminal Identifier	TRMED[9]	Transmission Medium Type	LMU{	Loop Makeup Aggregate, 1 per segment	LMSTAT [40]	Loop Makeup Status	LUINT [2]	Length Unit
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Created: 12/06/1999

Revised: 04/28/2000

	<p>NLD [2] Load Point Number, Null if Non-loaded COIL [4] Load Coil Type ES [9] End Section LDSP [15][9] Load Spacing BO{ Build Out Aggregate, 1-2 per LMU BOCAP [5] Build Out Capacity BORES [5] Build Out Resistance BOOFF [9] Build Out Offset SPL{ Splice Section Aggregate, 1-10 times per LMU GA [7] Gauge LGTH [9] Length UBA [1] Type of cable CAPAC [5] Capacitance BTOFF [9] Bridge Tap Offset</p> <p><u>OTHER</u> Loop composition (Copper/Fiber etc., length and wire gauge of each) Bridge taps (total kilofeet) Load coils (Presence) Pair gain devices DAML (Presence) Digital Loop Carrier (DLC) (Presence) Cross Box Identifier</p>
UR7762.0022	As a result of a user LM request, if no loop Make-Up data is found, the user shall receive a message to that effect.
UR7762 0023	Collectively, the user shall be able to submit at least 4,000 LM requests per "busy hour"
UR7762.0024	The user shall receive an average response time of 2 seconds or less, per individual user initiated query associated with the LM
UR7762 0025	As a result of a user LM request, if <u>any</u> loop make-up data is found, the user shall have the detail referenced in UR7762 0021, returned to them
UR7762.0027	The users' response from the Loop Make-Up request shall identify (in common English terms) the specific element label, in conjunction with retrieved data values associated with a given element
UR7762 0028	As a part of the LM process <u>for RESERVING new/spare facilities</u> , the user shall be able to cancel their own reservations
UR7762.0029	If a user attempts to cancel a reservation which, was initiated by a different user, the user requesting the cancellation will receive a message. The message will indicate that the submitting user is not the owner of the reservation and are therefore not authorized to cancel the request.
UR7762 0030	The user shall NOT be allowed to reserve facilities that are currently reserved

UR7762 0035	Not electronically supported for Phase 1 Rephrased as assumption. (5 6) to establish intent regarding future release
UR7762 0041	In association with a user request for New/Spare loop reservations, the user shall receive a Facility Reservation Number (FRN). The FRN will be mechanically generated based upon the following format CCCCZZZZZZMMDDYYYY With C being the CLEC identified and Z being a per-reservation unique value.
UR7762.0065	User requests involving 2 or 4 wire Unbundled Copper Loops - <u>Short</u> (UCL-S), shall have facility data returned from LFACS which meet the following criteria (PER PAIR basis) <ul style="list-style-type: none"> ▪ The facility loop type/composition is COPPER ▪ The facility meets Resistance Design (RD) spec of 1300 Ohms or less ▪ The facility is non-loaded ▪ The total loop length is LESS than or equal to 18 kft ▪ Less than 6 kft of Bridged Tap is associated with the facility.
UR7762 0071	User requests involving 2 or 4 wire Unbundled Copper Loops - <u>Long</u> (UCL-L), shall have facility data returned from LFACS which meet the following criteria (PER PAIR basis) <ul style="list-style-type: none"> ▪ The facility loop type/composition is COPPER ▪ The facility may have up to 2800 Ohms of Resistance or less ▪ The total loop length is Greater than 18 kft ▪ Less than 12 kft of Bridged Tap is associated with the facility.
UR7762.0105	The user shall be able to print the FRN and results returned from a query.
UR7762 0110	FORMAT EXHIBITS
	ID CLS - COMM LANG CIRCUIT ID-SERIAL NO 007 CLS DATA FORMAT INCORRECT! CLS DATA MUST APPEAR IN THE FOLLOWING FORMAT /CLS 12 PLNT 123456 66 SB WHERE 12 = PREFIX (OPTIONAL) (1-2 ALPHANUMERICS) WHERE PL = SERVICE CODE (2 ALPHABETICS PRECEDED BY A PERIOD) WHERE NT = MODIFIER (2 ALPHABETICS OR 1 ALPHABETIC AND 1 ALPHANUMERIC) WHERE 123456 = SERIAL NUMBER (1-6 NUMERICS OF 1-999999 PRECEDED BY A PERIOD)

Created: 12/06/1999

Revised: 04/28/2000

	<p>WHERE 66 = SUFFIX (OPTIONAL) (1-3 NUMERICS OF 1-999 PRECEDED BY A PERIOD) WHERE SB = ASSIGNING COMPANY IDENTIFICATION (2 OR 4 ALPHABETICS PRECEDED BY A PERIOD)</p> <p>NOTE 1 THE ABSENCE OF THE SUFFIX DATA IS INDICATED BY 2 PERIODS BETWEEN THE SERIAL NUMBER AND THE ASSIGNING COMPANY IDENTIFICATION</p> <p>NOTE 2 EXAMPLE CLS 12 PLNT 123456 SB ON CABS ORDERS AND SOUTH CENTRAL BELL NON-CABS ORDERS, THIS EDIT IS ONLY PERFORMED ON INWARD (E,I,T OR X) AND RECAPPED ACTIVITY</p> <p>NOTE 3 WHEN THE SPECIAL ACTION INDICATOR IS D OR THE FIFTH CHARACTER OF THE BASIC CLASS OF SERVICE IS Q, THE ASSIGNING COMPANY IDENTIFICATION MAY APPEAR AS THREE ALPHABETICS</p> <p>-----</p> <p>FID CLT - COMMON LANGUAGE CIRCUIT ID - TN FORMAT</p> <p>007 CLT DATA MUST BE FORMATTED AS FOLLOWS</p> <p>/CLT 38 SBGS 404 477 3999 T22 123 WHERE 38 = PREFIX (OPTIONAL) (1-2 ALPHANUMERICS) WHERE SB = SERVICE CODE (2 ALPHABETICS PRECEDED BY A PERIOD) WHERE GS = MODIFIER (2 ALPHANUMERICS OF AA-ZZ OR A1-Z9) WHERE 404 = NPA (3 NUMERICS PRECEDED BY A PERIOD) WHERE 477 = CENTRAL OFFICE (3 NUMERICS PRECEDED BY A PERIOD) WHERE 3999 = LINE NUMBER (4 NUMERICS PRECEDED BY A PERIOD) WHERE T22 = EXTENSION NUMBER/TRUNK CODE (OPTIONAL) (2-5 ALPHANUMERICS PRECEDED BY A PERIOD) WHERE 123 = SEGMENT NUMBER (OPTIONAL) (1-3 ALPHABETICS OR NUMERICS OF 1-999 OR A-ZZZ PRECEDED BY A PERIOD)</p> <p>-----</p> <p>FID TN - TELEPHONE NUMBER</p> <p>009 TN DATA FORMAT INCORRECT'</p> <p>TN MUST APPEAR ACCORDING TO ONE OF THE FOLLOWING FORMATS</p> <p>A I2 1FB /TN 101 555-1234-1235 WHERE 101 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1234 = LINE NUMBER - LOWER RANGE (4 NUMERICS) WHERE 1235 = LINE NUMBER - UPPER RANGE (4 NUMERICS)</p>	

	<p>OR,</p> <p>B I1 1FB /TN 101 555-1234 WHERE 101 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1234 = LINE NUMBER (4 NUMERICS)</p> <p>OR,</p> <p>C I3 1FB /TN 205 555-1111, 4333, 5555 WHERE 205 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1111= LINE NUMBER (4 NUMERICS) WHERE 4333= LINE NUMBER IN A SERIES (OPTIONAL) WHERE 5555= LINE NUMBER IN A SERIES (OPTIONAL)</p>
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encDocUserReq
ENC15069.DOC
CMVC Version 1 1

ENCORE User Requirements for

Letter of Authorization for LMU to Support Line Splitting

FINAL
ENC15069.DOC
Version 3.0
September 7, 2001
CMVC Version 1.1



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encDocUserReq
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1. SCOPE

1.1 Business Implications

1.1.1 Current Process

Current Process	
•	LMU (Loop Make-up) is provided when the Requester or BellSouth is the owner of the voice facility
•	
•	
•	

1.1.2 Expected Process

Expected Process	
•	Continue to provide LMU when the requesting Carrier or BellSouth owns the voice account.
•	LMU will be provided on any request, when authorization is valid that is provided by the requesting Carrier
•	Authorization is valid when data in LSP AUTH, LSP AUTHDATE and LSP AUTHNAME fields of the LSR are populated and the LSP AUTH is a valid match to the ownership of the account



2.0 User Requirements

Requirement No.	User Requirement
UR15069.0010	BellSouth will continue to provide LMU (Loop Make-up) on all BellSouth accounts requested by a Carrier (C/DLEC) without requiring the LSP authorization fields to be input.
UR15069 0020	<p>The following new fields are required to provide authorization capability.</p> <ol style="list-style-type: none"> 1. LSP AUTH – 4 alphanumeric. CC of CLEC granting the LOA 2. LSP AUTHDATE – 08 numeric MMDDCCYY. Date the LOA was granted 3. LSP AUTHNAME – 15 alphanumeric Name of the person from the CLEC who signed the LOA.
UR15069.0025	<ol style="list-style-type: none"> 1. When the requirements in UR15069.0020 are not met for the 3 new fields, system will return a message as stated below. LSP AUTH –CC of CLEC that is granting the LOA will be populated, else, return the following message. LSP AUTH MUST BE 4 ALPHANUMERIC 2. LSP AUTHDATE – Date the LOA was granted, must be populated as defined (MMDDCCYY), else, return the following message. LSP AUTHDATE FORMAT MUST BE NUMERIC 1. LSP AUTHNAME –Name of the person from the CLEC who signed the LOA. Require 15 alphanumeric characters or less, else return the following message. LSP AUTHNAME FIELD SIZE MUST BE LESS THAN 16 CHARACTERS.
UR15069.0030	<p>When any one of the 3 new fields in requirement UR15069 0020 is populated, require that all three fields be populated else, return the following message to the Requester.</p> <p>LSP AUTHORIZATION COMBINATION INVALID AS ENTERED</p>



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CMVC Version 1 1

Requirement No.	User Requirement
UR15069 0040	When LMU request is submitted for a facility not owned by BellSouth or the requester and valid <u>authorization is provided</u> within the request, LMU will be provided
UR15069 0050	When LMU request is submitted for a facility <u>not owned</u> by BellSouth or the requester and the field, <u>LSP AUTH</u> , is blank LMU <u>will not be provided</u> Advise requester that "AUTHORIZATION IS REQUIRED FROM THE OWNER OF THE FACILITY".
UR15069 0060	When LMU request is submitted for a facility <u>owned by the requester</u> , no <u>authorization</u> is required to obtain LMU.
UR15069 0070	When LMU request is submitted and LSP AUTH is populated, <u>validate authorization data matches</u> the facility owner identification before providing LMU.
UR15069 0080	When LMU request is submitted and LSP AUTH is populated and authorization data does not match the facility ownership, advise the requester that "AUTHORIZATION DOES NOT MATCH FACILITY OWNERSHIP". <u>LMU not provided</u> until validation is passed.
UR15069.0090	Include storage capability for new fields, LSP AUTH, LSP AUTHDATE and LSP AUTHNAME along with existing fields.
UR15069.0100	LSP AUTH, LSP AUTHDATE and LSP AUTHNAME are not required to view BellSouth facilities.
UR15069.0110	Requirement deleted 09/-5/01



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ENC15069 DOC
CMVC Version 1 1

2.3 New or Revised Error Messages

Requirement No.	Error Message
UR15069.0025	<ul style="list-style-type: none"> • "LSP AUTH MUST BE 4 ALPHANUMERIC" • "LSP AUTHDATE FORMAT MUST BE NUMERIC" • LSP AUTHNAME FIELD SIZE MUST BE LESS THAN 16 CHARACTERS
UR15069.0030	New Message: "LSP AUTHORIZATION COMBINATION INVALID AS ENTERED"
UR15069.0050	"AUTHORIZATION IS REQUIRED FROM THE OWNER OF THE FACILITY"
UR15069 0080	"AUTHORIZATION DOES NOT MATCH FACILITY OWNERSHIP"
UR15069.0100	Deleted 09/05/01

2.4 Service Order Exhibits

	Yes	No
Tested:	N/A	

Service Order Exhibit
N/A



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ENC15069 DOC
CMVC Version 1.1

2.5 Impact on LSR Data Fields

2.5.1 LSR Data Fields – To be Added

Field Name	LSR Section	Length (characters)	A AN N	R C O	Acceptable Entries
N/A					

2.5.2 LSR Data Fields – To be Revised

	Field Name	LSR Section	Length (characters)	A AN N	R C O	Acceptable Entries
Current	N/A					
Revised						
Current						
Revised						

2.5.3 LSR Data Fields – To be Deleted

Field Name	LSR Section
N/A	



2.6 Impact on FID

4.6.1 FID – Additions or Changes to be Implemented with this Feature

FID	Description	Service Order Section
N/A		

2.6.2 FID – To be Deleted From This Feature

FID	Description	Service Order Section
N/A		

2.7 Impact on USOCs – Additions or Changes to be Implemented with this Feature

USOC	Description	Valid States	Applicable FIDs
N/A			

To be completed by BCCM only

(1) CHANGE REQUEST LOG #	1633
(2) STATUS	R
(3) STATUS	
DATE SENT (2a): 12/18/03	

To be completed by CCM or BellSouth:

(3) REQUEST TYPE	<input type="checkbox"/> TYPE 2 (REGULATORY)	<input type="checkbox"/> TYPE 3 (INDUSTRY)	<input type="checkbox"/> TYPE 4 (BST)	<input checked="" type="checkbox"/> TYPE 5 (CLEC)
	<input type="checkbox"/> TYPE 6 (DEFECT) NOTE COMPLETE SECTION 2	<input type="checkbox"/> EXPEDITED FEATURE	<input type="checkbox"/> FLOW-THRU	

SECTION 1

(4) COMPANY NAME	AT&T
(5) OCN	7421
(6) CCM NAME	Jordana Jureidini
(7) TELEPHONE NUMBER	409-833-5328
(8) CCM EMAIL ADDRESS	jureidini@att.com
(9) CCM FAX NUMBER	281-664-3799
(10) ALTERNATE CCM NAME	Nicole Kisling – Birch Telecom
(11) ALTERNATE PHONE NUMBER	(816) 300-1575
(12) ORIGINATOR'S NAME	Jordana Jureidini
(13) ORIGINATOR'S PHONE NUMBER	409-833-5328
(14) TITLE OF CHANGE REQUEST	Revised process for viewing Resale/UNE-P CSRs (Customer Service Records) and DL CSRs for facility-based providers

Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives

(15) CATEGORY	<input type="checkbox"/> ADD NEW FUNCTIONLITY	<input checked="" type="checkbox"/> CHANGE EXISTING		
(16) DESIRED DUE DATE	ASAP			

(17) ORIGINATING CCM ASSESSMENT OF IMPACT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW	
(18) ORIGINATING CCM ASSESSMENT OF PRIORITY	<input type="checkbox"/> URGENT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW

(19) INTERFACES IMPACTED				
PRE ORDERING	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input checked="" type="checkbox"/> EDI Pre-Order	
ORDERING	<input type="checkbox"/> EDI	<input type="checkbox"/> LENS	<input type="checkbox"/> TAG	<input type="checkbox"/> LNP
MAINTENANCE	<input type="checkbox"/> TAFI	<input type="checkbox"/> EC-TA Local		
MANUAL	<input type="checkbox"/> Manual			

(20) TYPE OF CHANGE (Check one or more, as applicable)				
<input checked="" type="checkbox"/> Software	<input type="checkbox"/> Product & Services	<input type="checkbox"/> Documentation	<input type="checkbox"/> Hardware	<input type="checkbox"/> New or Revised Edits
<input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards	<input checked="" type="checkbox"/> Process	<input type="checkbox"/> Other	<input type="checkbox"/> Defect
<input type="checkbox"/> Expedited Feature	<input type="checkbox"/> Flow Through			

This section to be completed by BellSouth only

(21) DESCRIPTION OF REQUESTED CHANGE (Including purpose and benefit received from this change include attachments if available)	<p>The implementation of CR0246/CR0184 gave CLECs the ability to view CSRs for Resale/UNE-P end users, when the other CLEC grants that authorization. Under the existing process, each CLEC must manually update the BellSouth tables for each of its OCNs. This process is unnecessary.</p> <p>When pulling CSRs in LENS or unparsed CSRs via TAG, BellSouth requires the CLEC to certify that it has proper authorization to view the CSR information for each end user prior to providing the Retail CSR. If the CLEC has obtained proper authorization from the end-user, BellSouth should also provide CSR information for Resale/UNE-P CSRs and Directory Listing (DL) CSRs for Facility Based Providers.</p> <p>By providing these Resale/UNE-P/Facility based CSRs to all CLECs, BellSouth will increase the probability of CLECs submitting error-free orders.</p> <p>03/15/04 (REVISED) AT&T has agreed to remove the DL portion of this request</p> <p>05/19/04 SEE REVISED DESCRIPTION IN SECTION 31)</p>
(22) REQ TYP(s) IMPACTED	Pre-Order
(23) ACT TYP(s) IMPACTED	
(24) PROVIDE EXAMPLE OF REQUESTED CHANGE	BellSouth to provide unfettered access to Resale/UNE-P CSRs and DL CSRs (for facility based providers) to all CLECs that have obtained proper end user authorization
(25) Identify the LSOG versions that are affected by this change.	ELMS6
(26) Does this request require clarification?	<input type="checkbox"/> YES <input type="checkbox"/> NO
(27) Clarification Request Sent	
(28) Clarification Response Due	
(29) Change Request Review Date	
(30) Target Implementation Date	
(31) Change Review Meeting Results	<p>12/19/03 Being reviewed by BellSouth</p> <p>01/06/04 BellSouth is able to support this request, therefore, it is placed into AH status</p>

Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives

02/13/04 After further investigation of Change Request 1633, it has been determined that clarification is needed. We would like AT&T to clarify the intent of this change request. These are the items in question

- 1 Please clarify the statement in section 24 "The "unfettered access" for "end users" who have obtained proper authorization",
 - a Who are the "end users" referred to in this statement, the CLECS or the CLEC's customers?
 - b What is meant by "Unfettered Access"
- 2 Is the intent of this change request, for Any CLEC, to view Any CLECs CSR's, WITHOUT having to Grant permission?
- 3 Is the intent of this change request to only "Add" the functionality for all 3 systems (TAG, LENS and EDI), of granting & revoking access to "Directory Listing CSR's of facility based providers", and to "ADD" the functionality to TAG/XML and EDI, for granting and revoking permission, for other CLECs to view each others Resale and UNE-P CSR's?

02/16/04 Received reply from AT&T and Birch Telecom

- 1 Please clarify the statement in section 24 "The "unfettered access" for "end users" who have obtained proper authorization",

Question

- a Who are the "end users" referred to in this statement, the CLECS or the CLEC's customers?

Answer

- a) End users are CLEC/BellSouth customers

Question

- b What is meant by "Unfettered Access"

Answer

- b) We wanted unlimited access to all CLEC CSR's, regardless of the type of CLEC - UNE-P, Resale, or Facility -based

"Proper authorization" refers to end user authorization that complies with applicable state and federal law

Question

- 2 Is the intent of this change request, for Any CLEC, to view Any CLECs CSR's, WITHOUT having to Grant permission?

Answer

- 2 Yes The current process for granting and obtaining authorizations is cumbersome

Question

- 3 Is the intent of this change request to only "Add" the functionality for all 3 systems (TAG, LENS and EDI), of granting & revoking access to "Directory Listing CSR's of facility based providers", and to "ADD" the functionality to TAG/XML and EDI, for granting and revoking permission, for other CLECs to view each others Resale and UNE-P CSR's?

Attachment A-4A

providers", and to "ADD" the functionality to TAG/XML and EDI, for granting and revoking permission, for other CLECs to view each others Resale and UNE-P CSRs?

Answer

3 The intent of this CR is to provide all CLECs with access to all CLEC CRs maintained in BellSouth systems. This functionality should be available through EDI, XML, and LENS.

03/05/04, BellSouth will be able to support the portion of this request (CR1633) that will add the functionality of viewing Directory Listing CSR's to the EDI, TAG and LENS systems.

However, BellSouth is unable, due to CPNI (Customer Proprietary Network Information) restrictions, the portion of this change request that requests, "Unfettered Access" to ALL CLEC accounts.

03/15/04 Functionality of viewing DL (Directory Listing) CSRs already exist. AT&T has confirmed that they can grant other CLECs the ability to view Directory Listings and have tested this with another CLEC. AT&T has agreed to remove the DL portion of this request.

AT&T and Birch have also agreed to provide examples of where other RBOCs/ILECs are currently providing this capability and how they have managed to get around CPNI issues and allow BellSouth to investigate. CR moved to PC awaiting communication from CLEC.

05/18/04 CLEC sent email with a **REVISED** description to the request. CMT called CLEC for clarification of the description since no reference to the above requested examples were noted and also to be sure description is the same as the original request without the DL reference.

05/19/04 CMT spoke to CLEC regarding the following **REVISED** description to the request. BellSouth currently allows CLECs to view each other's CSRs through the BellSouth systems (LENS and XML, EDI will be available in 2005). While all CLECs (UNE-P, Resale, and Facility-based) can share their CSRs, the current process is tedious, requiring a multitude of CLEC to CLEC negotiations, followed by each CLEC updating the BellSouth tables via LENS.

AT&T and Birch believe that with appropriate end-user authorization, CLECs should have unfettered access to the customer's service records, and no other approval is necessary. However, until this issue is resolved, AT&T and Birch request that the current process be improved as described below. BellSouth should allow each CLEC to decide whether or not they are willing to share their CSRs with other CLECs. All CLECs agreeing to share CSRs will be given access to the CSRs for all the other CLECs willing to share CSRs. CLECs who do not wish to participate in sharing CSRs will not be granted access to any other CLEC CSRs.

Attachment A-4A

For example- CLECs A, B, C, and D are willing to share CSRs with other CLECs, CLECs X, Y, and Z are not willing to share CSRs with other CLECs. CLECs A, B, C, and D would all be granted access to each other's CSRs for UNE-P, Resale, and/or facilities-based customers through the BellSouth systems, CLECs X, Y, and Z would only be able to see CSRs for their own UNE-P, Resale and/or Facility-based customers

Rather than each CLEC having to administer their own tables, this would allow BellSouth to administer one "master" table

CMT agreed to update the request and resend to SME for review
Response will be provided thru CCP (AT&T agreed to update the "Title" of request to delete reference to DL)

CR removed from "PC" and placed in "N" status

05/24/04 Conference call held between CLEC and BST to clarify intent of the request. It was agreed that a final response would be provided by 05/28/04

05/25/04 BellSouth is unable to support this request as written due to Cost and Industry Standards

The following criteria was taken into consideration when making this decision

- Industry standard process flows defined in the ATIS 070 practice depicts the relationship is between old LSP and new LSP. BellSouth already provides beyond the industry expectations by allowing CLEC's to use our interfaces to obtain other CLEC CSR information when permission has been authenticated
- Cost-It is too costly for BellSouth to establish, monitor, maintain or sever relationships between CLEC trading partners
- The CR as written in it's current state, would in fact penalize the CLEC community by restricting CSR viewing options that are not BellSouth's options to restrict

BellSouth can support the following alternative solution

- BellSouth can provide "Grant All" capability to the existing functionality that will allow CLEC's the option to update their own profiles to allow other CLEC's with the same permission code set to view their CSR when BellSouth is the ILEC that maintains the CSR and authentication is confirmed
- The CLEC will continue to be the "Administrator of this process and will be allowed to **grant and revoke** permissions at will

If the CLEC elects to accept this alternative, the change request will be accepted and placed in AH status

(32) CANCELED CHANGE
REQUEST

☐ DUPLICATE

☐ TRAINING

☐ CLARIFICATION NOT RECEIVED

Attachment A-4A

(33) CANCELTATION ACKNOWLEDGMENT	<input type="checkbox"/> CLEC	<input type="checkbox"/> BST	DATE
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(34) APPEAL	<input type="checkbox"/> YES	<input type="checkbox"/> NO
(35) APPEAL CONSIDERATIONS		

SECTION 2

This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request

(36) PON #	
(37) ERROR MESSAGE	
(38) RELEASE OR API VERSION (If applicable)	
(39) DESCRIPTION OF DEFECT SCENARIO	

SECTION 3

This section to be completed by BellSouth – Internal Validation of Defect Change Request

(40) DEFECT VALIDATION RESULTS				
(41) CLARIFICATION NEEDED	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
(42) VALIDATED DEFECT IMPACT LEVEL	<input type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW	
(43) VALIDATION TYPE	<input type="checkbox"/> DEFECT	<input type="checkbox"/> FEATURE	<input type="checkbox"/> TRAINING ISSUE	<input type="checkbox"/> DUPLICATE
(44) DEFECT IMPACTS OTHER CLECS?	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
(45) INTERFACES IMPACTED BY DEFECT	<input type="checkbox"/> EDI <input type="checkbox"/> TAG <input type="checkbox"/> LNP <input type="checkbox"/> LENS <input type="checkbox"/> TCIF 7 <input type="checkbox"/> TCIF 9			
(46) TARGET IMPLEMENTATION DATE				